

Alan Nisselson, *Successor Chapter 7 Trustee*  
WINDELS MARX LANE & MITTENDORF, LLP  
156 West 56<sup>th</sup> Street  
New York, New York 10019  
Tel. (212) 237-1000 / Fax. (212) 262-1215

Abandonment: April 28, 2017 @ 12:00 p.m.  
Objections Due: April 21, 2017 @ 5:00 p.m.  
Hearing on Objections, if any: TBD

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

Indomitable Entertainment, LLC,

Debtor.

Chapter 7

Case No. 16-12177-smb

**SUCCESSOR TRUSTEE'S NOTICE OF ABANDONMENT PURSUANT TO  
BANKRUPTCY CODE § 554, FEDERAL RULE OF BANKRUPTCY PROCEDURE  
6007(a) AND LOCAL BANKRUPTCY RULE 6007-1 OF ALL DEBTOR'S  
PERSONAL PROPERTY CONSISTING OF CASH FUNDS, ACCOUNTS  
RECEIVABLE, WARRANTS, INTELLECTUAL PROPERTY, ROYALTIES,  
AGREEMENTS, AND OFFICE EQUIPMENT, FURNITURE AND SUPPLIES**

**PLEASE TAKE NOTICE** that, pursuant to 11 U.S.C. § 554, Rule 6007(a) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 6007-1 of the Local Rules (the “**Local Rules**”) of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”), on April 28, 2017 at 12:00 p.m., Alan Nisselson (the “**Successor Trustee**”), successor trustee of the chapter 7 estate of Indomitable Entertainment, LLC (the “**Debtor**”) proposes to abandon (the “**Abandonment**”) all of the Debtor’s personal property consisting of cash funds, accounts receivable, warrants, intellectual property, including internet domain names and trademarks, royalties, agreements and screenplays, office equipment, furniture and supplies (collectively, the “**Personal Property**”). The tangible Personal Property is located at Citiwide Self Storage, 45-55 Pearson Street, Unit IA85, Long Island City, New York, 11101, the cash fund are on deposit in the Successor Trustee’s account for the Debtor’s Estate. The Trustee has determined that the Personal Property is fully secured by a valid lien which exceeds the value of the property and is therefor of inconsequential value and is of no benefit and is burdensome to the Debtor’s estate.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Abandonment must be in writing, conform to the Bankruptcy Rules and the Local Rules, and be electronically

filed with the Bankruptcy Court in accordance with the General Order M-399, which, along with and User's Manual for the Electronic Case Filing System can be found at the Bankruptcy Court's Website located at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), and (A) be delivered to the Chambers of The Honorable Stuart M. Bernstein, United States Bankruptcy Judge, and (B) served by first-class mail so as to be received no later than **April 21, 2017 by 5:00 p.m.** (the "**Objection Date**") by: (i) the Bankruptcy Court, (ii) the Successor Trustee, Alan Nisselson, Windels Marx Lane & Mittendorf, LLP, 156 West 56<sup>th</sup> Street, New York, NY 10019, Attn: Alan Nisselson, Esq.; (iii) Weltman & Moskowitz LLP, counsel for the Debtor, 270 Madison Ave., Suite 1400, New York, NY 10977, Attn: Richard E. Weltman, Esq.; and (iv) the Office of the United States Trustee, Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Room 1006, New York, NY 10014, Attn: Greg Zipes, Esq.

**PLEASE TAKE FURTHER NOTICE** that if any objections to the Abandonment are filed and served as set forth above, a hearing (the "**Hearing**") will scheduled to be held before The Honorable Stuart M. Bernstein, in his Courtroom at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004. The Trustee will advise the objecting party of the Hearing date and time. The objecting party must attend the hearing either in person or telephonically (with Court permission). The Hearing may be adjourned without further notice except for an announcement at the Hearing.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Bankruptcy Rule 6007(a), the Abandonment of the Personal Property shall be deemed authorized unless an objection is filed by the Objection Date.

Dated: New York, New York  
March 31, 2017

Alan Nisselson, *Successor Chapter 7 Trustee*

By: /s/ Alan Nisselson  
Alan Nisselson ([anisselson@windelsmarx.com](mailto:anisselson@windelsmarx.com))  
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